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6 Attorneys for Defendant  
WELLS FARGO BANK, N.A. (erroneously sued herein as  
7 WELLS FARGO & COMPANY)

8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

11 MONTE RUSSELL, on behalf of himself  
12 and others similarly situated,

13 Plaintiff,

14 v.

15 WELLS FARGO & COMPANY,

16 Defendants.

CASE NO. C 07-03993 CW

JUDGE CLAUDIA WILKEN  
COURTROOM 2

**DECLARATION OF THOMAS  
FARRINGTON IN SUPPORT OF  
DEFENDANT WELLS FARGO BANK,  
N.A.'S OPPOSITION TO PLAINTIFF'S  
MOTION FOR CONDITIONAL  
COLLECTIVE ACTION  
CERTIFICATION UNDER FLA, 29  
U.S.C. § 216(b), AND FOR COURT-  
APPROVED NOTICE OF FLA  
CLAIMS**

Hearing Date: September 4, 2008  
Time: 2:00 p.m.  
Location: Courtroom 2

Complaint filed: August 2, 2007

**DECLARATION OF THOMAS FARRINGTON**

I, Thomas Farrington, declare and state as follows:

1. I have personal knowledge of the facts stated in this Declaration, and, if called upon as a witness, I could and would testify competently as to those facts.

2. I am presently employed by Wells Fargo Bank, N.A. ("Wells Fargo"), as a Technology Manager in one of its offices in Chandler, Arizona. I have been employed by Wells Fargo as a Technology Manager for approximately seven years.

3. In my position as a Technology Manager, I supervise a team of approximately 150 employees. My team includes 29 PC/LAN Analyst 3's, 23 PC/LAN Analyst 4's, and 3 PC/LAN Analyst 5's. The PC/LAN Analysts were formerly known as PC/LAN Engineers. The PC/LAN Analysts on my team are located in the following states: Arizona, Colorado, New Mexico, Texas, Nevada, Utah, Montana, Oregon, and Washington.

4. The day to day duties of individuals performing the PC/LAN Analyst 5 position are different than the day to day duties of individuals performing the PC/LAN Analyst 3 and 4 positions. The duties of all individuals holding PC/LAN Analyst positions vary from person to person and location to location based on, among other things, the experience and knowledge of the individual and location of the individual. Individuals located in different locations support different customer bases that have different needs and use different applications.

5. PC/LAN Analyst 5's on a day to day basis are expected to and do engage in duties including the following: (1) server engineering, including designs and

1 specialized builds of servers and server environments; (2) recommending and designing  
2 hardware, software, and other tools in a server environment that will positively impact  
3 users; (3) interfacing with other departments and groups to roll out new tools and  
4 technologies, including pulling in resources and determining the order for the roll out  
5 within the team that will best ensure that the impact of any change to the environment is  
6 minimized; (4) acting as a team lead, including mentoring lower level individuals and  
7 providing feedback to managers regarding employee performance; (5) identifying risks  
8 that may exist within the environment and developing and recommending resolutions;  
9 (6) providing input regarding modifications to internal processes, including security  
10 specifications; (7) acting as team lead for complex projects, including tool design  
11 projects; (8) coordinating with “customers” and other teams to determine how an  
12 application will best work in an environment and how to integrate a new application in  
13 compatibility with the environment. These duties are performed by individuals currently  
14 holding the PC/LAN Analyst 5 position and are the duties that were performed by  
15 individuals holding the PC/LAN Engineer 5 position during my employment as a  
16 Technology Manager.

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18 6. It would be very rare for a PC/LAN Analyst 5 to provide desktop  
19 support to an individual user. It would also be rare for a PC/LAN Analyst 5 to perform  
20 patching, update, or repair on a server. PC/LAN Analyst 5’s are not primarily involved  
21 in troubleshooting. PC/LAN Analyst 5’s are only involved in troubleshooting if there is  
22 a complex problem that several other people have tried to resolve and have been unable  
23 to do so. It is not the primary duty of a PC/LAN Analyst 5 to fix computer hardware or  
24 install software. Although there are protocols in place to ensure the security of the  
25 environment, PC/LAN Analyst 5’s are not constrained by predetermined instructions,  
26 specifications and procedures in performing their jobs.

1           7.     The current market reference point for a PC/LAN Analyst 5 in my  
2 area is \$95,300. The current market reference point in my area is \$70,300 for a PC/LAN  
3 Analyst 3 and \$81,600 for a PC/LAN Analyst 4.  
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5           I declare under penalty of perjury under the laws of the State of California  
6 and the United States of America that the foregoing is true and correct. Executed this  
7 13<sup>th</sup> day of August 2008, at Chandler, Arizona.  
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